

**Minutes for Rule 21 Working Group Meeting 55**  
**San Diego Gas & Electric**  
**San Diego**  
**June 22, 2004**

There were 29 working group members in attendance. The next meeting is scheduled for Oakland, hosted by PG&E, on July 20, 2004.

Scott Tomashefsky, Chair

Tom	Blair	City of San Diego	Robin	Luke	RealEnergy
Werner	Blumer	CPUC/ED	Randy	Minnier	MPE Consulting
Petrina	Burnham	SDG&E	Bob	Panora	Tecogen
Bill	Cook	SDG&E	Edan	Prabhu	Reflective Energies
George	Couts	SCE	Dave	Redding	Riverside Pub. Util.
Keith	Davidson	Tecogen	Nora	Sheriff	CAC/EPUC
Michael	Edds	DG Eergy Solutions	Joe	Simpson	Joe Simpson
Jeff	Goh	PG&E	Jim	Skeen	SMUD
Ed	Grebel	SCE	Chuck	Solt	Lindh & Assoc
Mike	Iammarino	SDG&E	Scott	Tomashefsky	CEC
Karl	Iliev	SDG&E	Gerome	Torribio	SCE
Jerry	Jackson	PG&E	Dan	Tunncliff	SCE
Scott	Lacy	SCE	Mohammad	Vaziri	PG&E
Carl	Lower	The Polaris Group			

**Utility Interconnection Activity Status Reports**

The utility activity status reports were reviewed. The utilities are now all using the consistant format. Gerry Toribbio questioned whether the format of the IOU status reporting was found to be sufficient. Tomashefsky said that while it may or may not meet the letter of the law, it meets the intent and provides the necessary information, so, yes it is sufficient.

**IEEE 1547 Interconnection Standard**

There will be meetings of the IEEE 1547 committees in Las Vegas, August 3 thru 6.

**DUIT Update**

Scott Tomashefsky said that at the July 20 Rule 21 meeting, there will be a presentation and a draft report of the test results of the islanding testing. The final report will be posted in late summer of 2004.

It was also announced that there is a new DOE contract for DUIT. Again, a test plan will be drafted and the Rule 21 Working Group will have a chance to review and comment before it is finalized.

**Extension of the Monitoring Program**

Joe Simpson gave a presentation of the findings so far for the Monitoring program being conducted under the Focus II PIER program. His presentation can be viewed by going to [www.dgmonitors.com](http://www.dgmonitors.com) and selecting "Program Documentation" and then "Final Report Briefing at Rule 21 Meeting 6/14/2004".

The final report on the Focus II phase is in review at the CEC. Once approved, the report will be shared with the Rule 21 committee for comments (Edan Prabhu says the report should be available before the July meeting). There was considerable discussion about the conclusions of the testing so far.

Funding for the monitoring program has been extended in Focus III. Edan said that in the next phase, they are looking for 1) Larger units, 2) Export, 3) Complex projects and 4) Hybrid installations. There was much discussion about what testing should be done. Edan indicated that there would be a test plan developed and reviewed by the Rule 21 Working Group the same as last time.

### **Rule 21 Certification**

At this time, there is only one certification in progress, Hess Microgen. That process is presently delayed awaiting additional data from Hess.

### **Rule 21 Compilation Document Advice Letter Status**

SDG&E now projects they will be filing their Advice Letter with the PUC by early July, 2004.

PG&E anticipates filing by July 20.

SCE hopes to file by the end of July.

### **Rule 21 Action Item Matrix**

The action item list had been updated with comments from all of the Champions. At the meeting the Working Group reviewed all of the changes and concurred. This included moving item T111 to the Process Group. The finalized list will be distributed before the July meeting.

### **Bin List**

A new Bin List has been distributed with items that were not resolved during the last revision. If you have new items or comments on items from the list, please send an email to [Chuck@CSolt.net](mailto:Chuck@CSolt.net).

### **PG&E Proposes a Study**

Jerry Jackson presented a one page proposal for an Export Study looking at Incidental vs. Inadvertent Export. Scott suggested that there may be a fee-related way of addressing the export issue. Jim Skeen elaborated on a modified approach to the initial and supplemental review for exporting systems: do some extended supplemental review "free" and if it appears there will be additional requirements, let the supplier know. Jim did a study 15 or so years ago on the cost of various interconnection options; Moh will see if we can find it.

## **Process Group Breakout**

### **Rule 21 Application Form**

The revised application form was reviewed. There were a number of changes agreed to. Mike Iammarino will incorporate the changes and it will be distributed in final form before the July meeting.

### **OIR R.04-03-017**

There was a brief discussion on the possible role of the Rule 21 Working Group in the DG OIR. There is a joint CEC/CPUC workshop on May 5 at the CEC to address the cost/benefit issue.

### **Process Group Action Item Matrix**

Item P109 was discussed. Anthony Mazy of CPUC/ORCA wants Rule 21 to indicate that "Developers are not responsible for anything not covered in Rule 21." Jerry Jackson discussed this in relationship to internal utility standards. There was general support within the group that there is discretion in Rule 21 and that a written document discussing implementation of Rule 21 is not inappropriate. The utilities spoke in opposition to this. Scott Tomashefsky agreed to be responsible for this item.

## **Technical Group Breakout**

### **Action Item List Review**

Reviewed the Action Item list and updated. Some highlights:

- T111 – During the combined meeting it was agreed to move this item to Policy.
- T126 – Vaziri is adding new information (machine-based technology, spot network interconnections, and newly approved relays) and recirculate for comments
- T110 – DUIT/DOE sponsored meeting on network interconnection tentatively planned for this fall in New York
- New tasks T128 – T1133 were defined; most assigned champions, and due dates for next actions (see attached Action Items 2004-06-22 (CMW).xls).

Regarding new action items the following topics were discussed, and should be considered for future Action Items.

- **Distribution system of tomorrow:** How do we design new distribution systems to accommodate DG? Is this a Rule 21 issue, i.e., what hand can Rule 21 have in the design of the Distribution System?
- **Legislative Updates:** Someone should keep track of and regularly summarize for the working group legislative issues that are relevant to Rule 21. It's difficult to keep up with all of the legislative processes and it would be very helpful to some to have this information summarized and presented at each meeting. No one volunteered to take this on, so we decided to not yet add this as an AI—may be more appropriate as a general Agenda item then as an AI.
- **Research Updates:** Someone should similarly keep track of research that is relevant to Rule 21. Same issue as Legislation: it's difficult to keep up with all of the activities going on around the country and around the world in DG-related research. This is somewhat inline with T108, the bibliography, and it would be good to have as many papers and reports as possible linked to a Rule 21 accessible web page somewhere. Like the Bibliography, it's up t

### **T105 Inadvertent Export**

Reviewed and agreed with Bill Cook's suggestion for placement of the Inadvertent Export discussion as Annex A in the Supplemental Review Guideline. Bill will circulate a few sentences for inclusion in Screen 2 that will reference the new Annex.

### **C101 Export Screen:**

The group discussed the Export screen and reviewed comments received.

The group agreed with Ed Grebel's suggestion of changing Option 4 to read "...to ensure that power will not be exported across the PCC" The group also added Werner Blummer's suggested screen question to the list of candidates (see below) and to note that Significance 2 applies to Options 1 and 2. The group did not agree to adding suggested references to Net Energy Metering (since whether or not a system is NEM does not change the technical approach for dealing with the application). Also, the group again expressed a preference to delete the word "incidental" rather than define it.

Discussed the 10 amp proposed limit to Option 3. Bob Panora felt that 10 amps was too low. Bill Cook suggested that utilities evaluate the 10A (or maybe 10% of line capacity) along with the other Option 3 limits to see if there are situations that cause problems. Karl Iliev agreed revise their proposal based on his notes from this meeting to address the issues raised. Jim Skeen will provide an example to see where 10% may or may not be a problem.

We came up with a number of alternative questions for the Export Screen:

1. Is the intent of this DG to export?
2. Are the Export Conditions Acceptable?
3. Are the power flow conditions acceptable?
4. Are the power flow conditions at the PCC acceptable?
5. Is the possibility of Export mitigated by one of the following options?
6. Is the possibility of Islanding mitigated by one of the following options?
7. Is the possibility of Export & Islanding mitigated by one of the following options?
8. Will more than incidental power be exported across the PCC?
9. Does the system meet one of the following export screens?
10. Is the Export within acceptable limits
11. Is the Export condition acceptable at the PCC (The following four options define acceptable export conditions)
12. Will power exported across the PCC be within acceptable limits
13. Is the amount of Export power sufficiently mitigated by one of the four options
14. Are the issues related to Export across the PCC addressed by one of the following options?
15. Could Export across the PCC adversely affect the EC Distribution System?
16. Is transfer of power across the PCC controlled by one of the following options?

17. Is Export across the PCC controlled by one of the following options?
18. Is Export across the PCC adequately controlled?
19. Are the issues related to Export across the PCC adequately addressed?

There seemed to be a preference to include the word “Export” in the question so that we can continue to refer to it as the Export Screen, and because that is really the issue of concern (i.e., not obfuscate with terms like “power flow”). There was also a preference for a question that was specific rather than general (i.e., not simply “are any of the following options met?”). We will encourage the group to suggest other candidate questions and we will attempt to get to

**Pre-parallel inspection/Commissioning test question**

Jerry Jackson asked what each utilities’ pre-parallel inspection practices are to determine what is necessary/appropriate and when the test needs to be performed or witnessed by the utility. The conclusion was that the existing Rule 21 Section J. J.5 commissioning test requirements (as modified in the April compilation document) adequately define what testing needs to be performed, and gives the utility the appropriate latitude for witness testing.

Respectfully Submitted:

C. Solt

Approved:

Scott Tomashefsky